

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

EDELIEL ESANULSANCHAZE RAINNEY

NO. 2:24-CR-083-Z

JOINT MOTION TO CONTINUE TRIAL

The United States of America (the “government”) and Edeliel Esanulsanchaze Rainey, through counsel, file this joint motion to continue trial as follows:

1. Trial in this case is currently set for April 1, 2025. (Dkt. 52.)
2. The parties have conferred and respectfully ask the Court to continue the trial setting for at least 30 days. The parties have been in plea discussions about a conditional plea to a Superseding Information. The parties are cautiously optimistic that a plea agreement can be reached in this case. However, counsel for Mr. Rainey is in trial this week and would like additional time to thoroughly discuss the proposed plea agreement with her client. Accordingly, the parties ask for at least a 30-day continuance. As noted, the parties are optimistic that a trial will be unnecessary.

Respectfully submitted,

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY

s/ Jeffrey R. Haag
JEFFREY R. HAAG
Assistant United States Attorney
West Texas Branch Chief
Texas State Bar No. 24027064
1205 Texas Avenue, Suite 700
Lubbock, Texas 79401
Telephone: 806.472.7559
Facsimile: 806.472.7394
E-mail: jeffrey.haag@usdoj.gov

CERTIFICATE OF CONFERENCE

I certify that I conferred with Antoinette Harris, attorney for Rainey, and she joins this motion.

s/ Jeffrey R. Haag
JEFFREY R. HAAG
Assistant United States Attorney